

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

LUCRETIA MOONEY,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
FINANCE CORPORATION;
MERIT LIFE INSURANCE COMPANY;
YOSEMITE INSURANCE COMPANY;
ROY EVANS; MELODEE WYATT;
and Fictitious Defendants "A",
"B", and "C", whether singular or plural, those
other persons, corporations, firms, or other
entities whose wrongful conduct caused
the injuries and damages to the Plaintiff,
all of whose true and correct names are
unknown to Plaintiff at this time, but will
be substituted by amendment when ascertained,

Defendants.

CIVILCASE NO. 05-241

EDDIE D. MALLARD
CIRCUIT CLERK

2005 DEC 19 P 4: 19

FILED IN
CIRCUIT CLERKS OFFICE
MACON COUNTY, AL

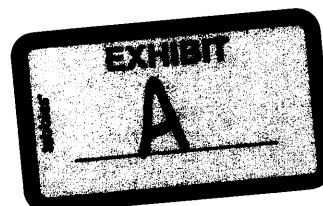
SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN INTERNATIONAL GROUP, INC.
70 Pine Street
New York, NY 10270

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand-deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,



C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Mallard
CIRCUIT CLERK

Dated: 12/19/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

LUCRETIA MOONEY,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
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the injuries and damages to the Plaintiff,
all of whose true and correct names are
unknown to Plaintiff at this time, but will
be substituted by amendment when ascertained,

Defendants.

CIVILCASE NO. 05-241

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EDDIE D. MALLARD
CIRCUIT CLERK

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN GENERAL CORPORATION
2929 Allen Parkway
Houston, TX 77019

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand-deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Malled
CIRCUIT CLERK

Dated: 12/19/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

LUCRETIA MOONEY,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
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AMERICAN GENERAL FINANCE, INC.;
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OF ALABAMA, INC.; AMERICAN GENERAL
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Defendants.

CIVILCASE NO. 05-241

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CIRCUIT CLERKS OFFICE
MACON COUNTY, AL
2005 DEC 19 P 4:19
EDDIE D. MALLARD
CIRCUIT CLERK

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN GENERAL FINANCE, INC.
n/k/a American General Financial Services of Alabama, Inc.
c/o CSC Lawyers Incorporating Service, Inc.
150 S. Perry Street
Montgomery, AL 36104

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand-deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.


CIRCUIT CLERK

Dated: 12/19/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

LUCRETIA MOONEY,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
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Defendants.

CIVILCASE NO. 15-241

EDDIE D. MALLARD
CIRCUIT CLERK

2005 DEC 19 P 4: 19

FILED IN
CIRCUIT CLERKS OFFICE
MACON COUNTY, AL

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN GENERAL FINANCIAL
SERVICES OF ALABAMA, INC.
c/o CSC Lawyers Incorporating Service, Inc.
150 S. Perry Street
Montgomery, AL 36104

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand-deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Halland
CIRCUIT CLERK

Dated: 12/19/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

LUCRETIA MOONEY,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
FINANCE CORPORATION;
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ROY EVANS; MELODEE WYATT;
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Defendants.

CIVILCASE NO. 05-241

EDDIE D. MALLARD
CIRCUIT CLERK

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MACON COUNTY, AL

SUMMONS

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NOTICE TO: AMERICAN GENERAL FINANCE CORPORATION
2929 Allen Parkway
Houston, TX 77019

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C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Hallen
CIRCUIT CLERK

Dated: 12/19/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

LUCRETIA MOONEY,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP, INC;
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AMERICAN GENERAL FINANCIAL SERVICES
OF ALABAMA, INC.; AMERICAN GENERAL
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MERIT LIFE INSURANCE COMPANY;
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CIVILCASE NO. 05-241

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SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO: **MERIT LIFE INSURANCE COMPANY**
c/o Superintendent of Insurance
601 NW Second Street
Evansville, IN 47708

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand-deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Eddie D. Mallett
CIRCUIT CLERK

Dated: 12/19/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

LUCRETIA MOONEY,

Plaintiff,

vs.

CIVILCASE NO. 05-241

AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
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Defendants.

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

YOSEMITE INSURANCE COMPANY
c/o Superintendent of Insurance
717 Market Street
San Francisco, CA 94103

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand-deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

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Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

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Dated: 12/19/05

IN THE CIRCUIT COURT OF MACON COUNTY, ALABAMA

LUCRETIA MOONEY,

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EDDIE D. MALLART
CIRCUIT CLERK

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Roy Evans
c/o American General Financial Services
of Alabama, Inc.
Colonial Promenade Montgomery
2768 Eastern BLVD
Montgomery, AL 36117-1550

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C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

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Plaintiff,

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CIVILCASE NO. 05-241

AMERICAN INTERNATIONAL GROUP, INC;
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Defendants.

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EDDIE D. MALLARD
CIRCUIT CLERK

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Melodee Wyatt
c/o American General Financial Services
of Alabama, Inc.
Colonial Promenade Montgomery
2768 Eastern BLVD
Montgomery, AL 36117-1550

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C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

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LUCRETIA MOONEY,

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COMPLAINT

STATEMENT OF THE PARTIES

1. This court has subject matter and personal jurisdiction over the Defendants. Venue is proper in Macon County, Alabama.
2. Plaintiff Lucretia Mooney is an adult resident citizen of Macon County, Alabama.
3. Defendant American General Finance, Inc. is a domestic corporation, who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the "alter-ego" of one or more Defendants.

4. Defendant American General Financial Services of Alabama, Inc. is a domestic corporation, who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

5. Defendant American International Group, Inc. is a foreign corporation who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

6. Defendant American General Corporation is a foreign insurance Company who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

7. Defendant American General Finance Corporation is a domestic corporation, who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

8. Defendant Merit Life Insurance Company is a foreign insurance company who does business by agent in Macon County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

9. Defendant Yosemite Insurance Company is a foreign corporation who does business by agent in Macon County, Alabama. This Defendant is the parent corporation, agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

10. Defendant Roy Evans is over the age of nineteen (19) and is a resident of Montgomery County, Alabama.

11. Defendant Melodee Wyatt is over the age of nineteen (19) and is a resident of Montgomery County, Alabama.

12. Fictitious Defendants "A", "B", and "C", whether singular or plural, are those other persons, firms, corporations, or other entities whose wrongful conduct caused or contributed to cause the injuries and damages to the Plaintiff, all of whose true and correct names are unknown to Plaintiff at this time, but will be substituted by amendment when ascertained.

13. Plaintiff's claims are brought solely under Alabama law, and Plaintiff states she does not bring any claim and/or disclaims any and all claims under any Federal laws, statutes, or regulations.

STATEMENT OF THE FACTS

14. On or about June 10, 2004, May 9, 2005, and other occasions, Plaintiff entered into loans with Defendant American General Financial Services of Alabama, Inc. or Defendant American General Finance, Inc. Defendants Roy Evans and Melodee Wyatt handled one or more of these loan transactions, while acting as agents for all Defendants, and fraudulently represented to her that if she purchased the credit insurance offered her, her credit score/rating would be better and that she stood a better chance of getting approved for the loan she requested.

15. Defendants advised Plaintiff that if she refinanced her previous loans into a single loan, that would be the best way for her to save money. Defendants refused to allow Plaintiff to have a separate loan.

16. Defendants advised Plaintiff that purchasing the credit insurance offered was a good deal and offered great value and protection.

17. Defendants had a duty to Plaintiff to give her good advice and they failed to do so, to Plaintiff's detriment.

18. Based on each of the representations made by Defendants, Plaintiff agreed to purchase the credit insurance offered and refinance her loan.

19. Defendants' conduct under the circumstances was intentional and amounts to actual malice.

20. Plaintiff discovered the fraud within two (2) years of filing this lawsuit.

21. Defendants entered into a pattern or practice of fraudulent conduct that included the fraud practiced on Plaintiff.

22. At all times material hereto, Plaintiff depended on Defendants to advise her as to all loan requirements and insurance matters. Defendants had superior knowledge and bargaining power over Plaintiff.

23. The conduct by Defendants was intentional, gross, wanton, malicious, and/or oppressive.

COUNT ONE

24. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

25. Defendants made the aforementioned fraudulent representations that they knew were false, or should have known were false, and intended for Plaintiff to rely on said false representations.

26. Plaintiff did rely on the representations made by Defendants and due to Defendants' fraudulent misrepresentation of material facts, Plaintiff was induced to act as previously described.

27. As a proximate consequence of Defendants' actions, Plaintiff was injured and damaged in at least the following ways: she paid money for insurance she did not want, she lost interest on said money, she paid excessive interest on her loans and accounts she otherwise would not have had to pay, she lost interest on the money attributed to the unnecessary payments, she has suffered mental anguish and emotional distress; and has otherwise been injured and damaged.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

COUNT TWO

28. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

29. Defendants negligently and/or wantonly hired, trained, and supervised Defendants Roy Evans and Melodee Wyatt and their agents, alter-egos and/or representatives responsible for advising Plaintiff of the loan and insurance benefits and all other requirements.

30. As a proximate consequence of Defendants' actions, Plaintiff was injured and damaged as alleged herein.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

COUNT THREE

31. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

32. Plaintiff was not experienced in insurance and finance matters and placed a special trust and confidence in Defendants and consequently relied upon Defendants to properly advise her with respect to such matters.

33. Defendants undertook a duty to advise Plaintiff, held themselves out as experts, and as persons interested in Plaintiff's well-being, and generally exhibited behavior inconsistent with the typical debtor-creditor relationship.

34. As a result of the aforementioned actions, Defendants conduct amounts to a breach of their individual, contractual, professional and fiduciary obligations and duties to

Plaintiff. Said conduct further amounts to a breach of the duties that arise as a matter of Alabama law.

35. As a proximate consequence of the Defendants breach, Plaintiff was injured and damaged as alleged herein.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

COUNT FOUR

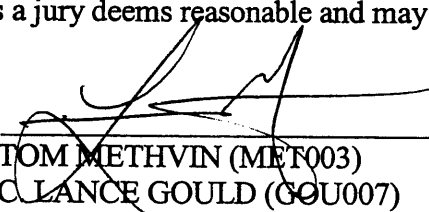
36. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

37. Defendants negligently and/or wantonly made the aforementioned representations to Plaintiff.

38. Said action was a breach of the duty owed Plaintiff.

39. As a proximate consequence of said actions, Plaintiff was injured and damaged as described herein.

WHEREFORE, Plaintiff demands judgment against Defendant in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.



TOM METHVIN (MEF003)
CLANCE GOULD (GOU007)
WILLIAM H. ROBERTSON, V (ROB161)
Attorneys for Plaintiff

OF COUNSEL:
BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.
272 Commerce Street
Montgomery, Alabama 36104
Telephone No.: (334) 269-2343
Facsimile No.: (334) 954-7555

**PLAINTIFF REQUESTS TRIAL BY STRUCK JURY
OF ALL ISSUES PRESENTED BY THIS CAUSE**



OF COUNSEL

State of Alabama Unified Judicial System Form ARCiv-93 Rev.5/99	COVER SHEET CIRCUIT COURT – CIVIL CASE (Not For Domestic Relations Cases)	Case Number <input type="checkbox"/> C <input checked="" type="checkbox"/> V 2005 0247 - <input type="checkbox"/> <input type="checkbox"/> Date of Filing: <input type="checkbox"/> 12 / <input type="checkbox"/> 19 / <input type="checkbox"/> 2005 Judge Code: <input type="checkbox"/> XXX <input type="checkbox"/> <input type="checkbox"/> Month Day Year						
IN THE CIRCUIT COURT OF <u>MACON</u> , ALABAMA <u>LUCRETIA MOONEY</u> (Name of County) v. <u>AMERICAN INTERNATIONAL GROUP, INC.</u>								
<table style="width:100%; border: none;"> <tr> <td style="width:50%; border: none;"> Plaintiff First Plaintiff <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other </td> <td style="width:50%; border: none;"> Defendant First Defendant <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other </td> </tr> </table>			Plaintiff First Plaintiff <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other	Defendant First Defendant <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other				
Plaintiff First Plaintiff <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other	Defendant First Defendant <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other							
NATURE OF SUIT: Select primary cause of action, by checking box (check only one) the best characterizes your action:								
TORTS: PERSONAL INJURY <input type="checkbox"/> WDEA - Wrongful Death <input type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input checked="" type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____ TORTS: PERSONAL INJURY <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Property OTHER CIVIL FILINGS <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Services	OTHER CIVIL FILINGS (cont'd) <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/ Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case							
ORIGIN (check one): F <input checked="" type="checkbox"/> INITIAL FILING A <input type="checkbox"/> APPEAL FROM DISTRICT COURT O <input type="checkbox"/> OTHER: R <input type="checkbox"/> REMANDED T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT								
HAS JURY TRIAL BEEN DEMANDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P., for procedure)								
RELIEF REQUESTED: <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED								
ATTORNEY CODE: <table style="display: inline-table; border: 1px solid black; text-align: center; width: 100px;"> <tr> <td>G</td><td>O</td><td>U</td><td>0</td><td>0</td><td>7</td> </tr> </table> <u>December 15, 2005</u> Date Signature of Attorney/Party filing this form			G	O	U	0	0	7
G	O	U	0	0	7			
MEDIATION REQUESTED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNDECIDED								

Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.

JERE LOCKE BEASLEY
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MICHAEL J. CROW
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RICHARD D. MORRISON **
C. GIBSON VANCE
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December 15, 2005

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OF COUNSEL:
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ALSO ADMITTED IN ARKANSAS
ALSO ADMITTED IN FLORIDA
ALSO ADMITTED IN GEORGIA
ALSO ADMITTED IN KENTUCKY
ALSO ADMITTED IN MINNESOTA
ALSO ADMITTED IN MISSISSIPPI
ALSO ADMITTED IN NEW YORK
ALSO ADMITTED IN OHIO
ALSO ADMITTED IN OKLAHOMA
ALSO ADMITTED IN SOUTH CAROLINA
ALSO ADMITTED IN TENNESSEE
ALSO ADMITTED IN TEXAS
ALSO ADMITTED IN WASHINGTON, D.C.
ALSO ADMITTED IN WEST VIRGINIA

JAMES W. TRAEGER
1953-1987

RONALD AUSTIN CANTY
1963-2004

Macon County Circuit Court
Eddie D. Mallard, Clerk
101 E. Northside Street
Tuskegee, AL 36083-0723

Re: Lucretia Mooney v. American International Group, Inc.

Dear Mr. Mallard:

Enclosed for filing please find the original and one copy of the Complaint in the above-referenced matter. Please return a stamped filed copy to me in the envelope provided.

Should you have any questions, please do not hesitate to call.

Thank you for your assistance with this matter.

Sincerely,

BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.

Tammy Price


TAMMY PRICE
Legal Secretary to C. Lance Gould


t/
Enclosures

EDDIE D. MALLARD
CIRCUIT CLERK

FILED IN
CIRCUIT CLERKS OFFICE
MACON COUNTY, AL
2005 DEC 19 P 4:18

135/20

Article Number		COMPLETE THIS SECTION ON DELIVERY	
 7160 3901 9848 8110 0220		A. Received by (Please Print Clearly) _____ B. Date of Delivery 12/20/05 C. Signature <i>James Viles</i> D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:	
Service Type CERTIFIED MAIL Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input type="checkbox"/> No Article Addressed to: Melodee Wyatt c/o American General Financial Services of Alabama, Inc. Colonial Promenade Montgomery 2768 Eastern BLVD Montgomery, AL 36117-1550		Reference Information Lucretia Mooney v. American General Charles Lance Gould CV-05-241 SC	
Domestic Return Receipt		PS Form 3811, July 2001	

Article Number		COMPLETE THIS SECTION ON DELIVERY	
 7160 3901 9848 8110 0276		A. Received by (Please Print Clearly) <i>James Viles</i> B. Date of Delivery 12/20/05 C. Signature <i>James Viles</i> D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:	
Service Type CERTIFIED MAIL Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input type="checkbox"/> No Article Addressed to: American General Financial Services of Alabama, Inc. c/o CSC Lawyers Incorporating Service, Inc. 150 S. Perry Street Montgomery, AL 36104		Reference Information Lucretia Mooney v. American General Charles Lance Gould CV-05-241 SC	
Domestic Return Receipt		PS Form 3811, July 2001	

ALABAMA JUDICIAL DATA CENTER
COURT PAYMENT SYSTEM

COUNTY
DATE OF RECEIPT: 12/19/2005 TIME: 16:32:11 RECEIPT NUMBER: 040855
RECEIPT FOR CASE: CV 2005 000241 00 BATCH: 2006062
RECEIVED FROM: GOULD CHARLES LANCE

LUCRETIA MOONEY VS AMERICAN INTERNATIONAL GROUP, INC.

ACCOUNTS RECEIPTED:

CV05	\$333.00
JDMD	\$100.00
SERA	\$120.00

RECEIVED BY: MRA CHECK AMOUNT \$553.00

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